

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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D. JOSEPH KURTZ, Individually and on	:	Civil Action No. 1:14-cv-01142-PKC-RML
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
KIMBERLY-CLARK CORPORATION, et al.,	:	
	:	
Defendants.	:	
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GLADYS HONIGMAN, Individually and on	:	Civil Action No. 2:15-cv-02910-PKC-RML
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
KIMBERLY-CLARK CORPORATION,	:	
	:	
Defendant.	:	
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**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Representative plaintiffs Dr. D. Joseph Kurtz and Gladys Honigman (together, “Plaintiffs”), respectfully move this Court, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be determined by the Court, for an Order:

1. Granting preliminary approval of the Settlement;
2. Certifying a Rule 23(b)(3) class for settlement purposes;
3. Appointing Plaintiffs as Class Representatives;
4. Appointing Robbins Geller Rudman & Dowd LLP as Settlement Class Counsel;
5. Approving the Settling Parties’ proposed form and method of providing notice of the pendency of the Settlement to the Settlement Class under Rule 23(e)(2); and
6. Scheduling a Settlement hearing for Final Approval of: (a) the Settlement set forth in the Settlement Agreement and General Release; and (b) Settlement Class Counsel’s application for an award of attorneys’ fees and expenses incurred in representing the Settlement Class.

In support of this Motion, Plaintiffs incorporate by reference its Memorandum, Declaration of Vincent M. Serra and supporting exhibits, which are filed simultaneously herewith.

DATED: April 5, 2022

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
VINCENT M. SERRA
FRANCIS P. KARAM
SARAH E. DELANEY

/s/ Vincent M. Serra

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Vincent M. Serra, hereby certify that on April 5, 2022, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice.

/s/ Vincent M. Serra

VINCENT M. SERRA